

ORIGINAL

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2/21/01

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CHARLES ISELEY,

Plaintiff

v.

W. CONWAY BUSHEY, et al.,

Defendants

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:No. 1:00-CV-00577  
(Judge Kane)

FILED  
HARRISBURG  
FEB 20 2001  
MARY E. D'ANDREA, CLERK  
Per [Signature]  
DEPUTY CLERK

**DEFENDANTS' MOTION TO EXTEND  
DEADLINE FOR FILING DISPOSITIVE MOTIONS**

Defendants, by their counsel, hereby request the Court to extend the deadline for the filing of dispositive motions in this case until May 30, 2001. In support of this motion, defendants state as follows:

1. This action was transferred to Middle District of Pennsylvania on February 23, 2000.
2. On May 30, 2000, defendants filed an answer to the complaint.
3. Discovery in this case closed on January 30, 2001 and all dispositive motions are to be filed on or before March 2, 2001.
4. The parties have engaged in discovery. Currently pending before this court is Iseley's Motion for An Enlargement of Time to Complete Discovery. In his motion, Iseley seeks to extend discovery for an additional ninety days.
5. On February 7, 2001, defendants filed a response to Iseley's motion, not opposing his request to extend discovery for ninety days, which would close discovery in the case on April 30, 2001.

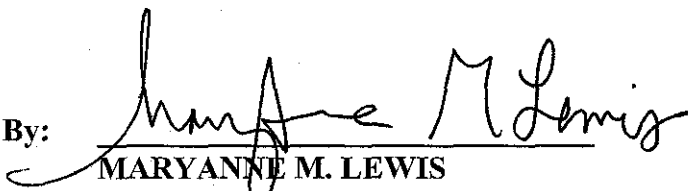
6. In light of the unopposed motion to extend discovery for ninety days, defendants seek an extension of time to file dispositive motions. Defendants request that the Court extend the deadline for filing dispositive motions until May 30, 2001.

7. No prejudice will befall any party by this extension of limited duration as proposed herein.

WHEREFORE, defendants respectfully request the Court to grant an extension of time to file dispositive motions until May 30, 2001.

Respectfully submitted,

**D. MICHAEL FISHER**  
Attorney General

By:   
**MARYANNE M. LEWIS**  
Deputy Attorney General

**SUSAN J. FORNEY**  
Chief Deputy Attorney General  
Chief Litigation Section

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15th Floor, Strawberry Sq.  
Harrisburg, PA 17120  
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**DATE: February 20, 2001**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CHARLES ISELEY,

Plaintiff

v.

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Defendants

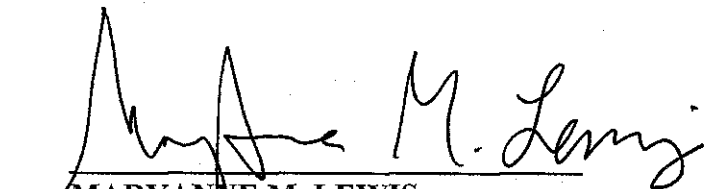
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No. 1:00-CV-00577  
(Judge Kane)

CERTIFICATE OF SERVICE

I, Maryanne M. Lewis, Deputy Attorney General, hereby certify that on this date I caused to be served the foregoing Defendants' Motion to Extend Deadline for Filing Dispositive Motions, by depositing a copy of the same in the United States mail, postage prepaid, in Harrisburg, PA., addressed to the following:

Charles Iseley, #AM-9320  
SCI-Coal Township  
1 Kelley Dr.  
Coal Township, PA 17866

  
MARYANNE M. LEWIS  
DEPUTY ATTORNEY GENERAL

DATE: February 20, 2001